

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
Jackson Division**

**MISSISSIPPI ASSOCIATION OF  
EDUCATORS, BARBARA PHILLIPS,  
JAMES THOMAS, DAWN ZIMMERER,  
L.E. JIBOL, UNITED CAMPUS  
WORKERS SOUTHEAST LOCAL 3821,  
MADISYN DONLEY, ALEXIS COBBS,  
KAREN ADERER, FOSTERING  
LGBTQ+ ADVOCACY, RESOURCES,  
ENVIRONMENTS AND WOMEN IN  
SCIENCE AND ENGINEERING,**

**Civil No. 3:25cv00417-HTW-LGI**

***Plaintiffs,***

**v.**

**LYNN FITCH, ET AL.,**

***Defendants.***

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**PLAINTIFF MISSISSIPPI ASSOCIATION OF EDUCATORS' MOTION TO BE  
REMOVED AS PLAINTIFF**

Plaintiff Mississippi Association of Educators ("MAE"), through undersigned counsel, hereby requests, pursuant to Rule 21 of the Federal Rules of Civil Procedure, that it be removed as a plaintiff. In support thereof, MAE sets forth as follows:

1. Rule 21 provides that the Court "may at any time, on just terms, add or drop a party."
2. MAE has informed counsel today that it does not wish to be a plaintiff in this matter and wants to be removed from the case altogether.
3. Counsel for Plaintiffs anticipate requesting in the near future leave to add plaintiffs whose position regarding the constitutionality of H.B. 1193 and the harm they will

suffer is identical to MAE. As a result, Defendants will suffer no prejudice as a result of MAE's dismissal, and the interests of judicial economy will not be implicated.

4. This motion is filed pursuant to counsel's duty of candor to the Court.

Based on the foregoing, Plaintiff MAE respectfully requests that it be removed from this action. Plaintiff MAE requests further that its name not be listed in the style of the case following its removal as a party.

Dated: July 11, 2025

Respectfully submitted,

<p><u>S/ ROBERT B. MCDUFF</u>  ROBERT B. MCDUFF  MS BAR NO. 2532  PALOMA WU  MS BAR NO. 105464  MISSISSIPPI CENTER FOR JUSTICE  210 E. CAPITOL STREET, STE 1800  JACKSON, MS 39201  PHONE: (601) 259-8484  <a href="mailto:RMCDUFF@MSCENTERFORJUSTICE.ORG">RMCDUFF@MSCENTERFORJUSTICE.ORG</a>  <a href="mailto:PWU@MSCENTERFORJUSTICE.ORG">PWU@MSCENTERFORJUSTICE.ORG</a></p> <p>AMIR BADAT  MS BAR NO. 106599  BADAT LEGAL PLLC  P.O. Box 15  TOUGALOO, MS 39174  PHONE: (601) 462-9592  <a href="mailto:AMIR.BADAT@GMAIL.COM">AMIR.BADAT@GMAIL.COM</a></p>	<p><u>S/ JOSHUA TOM</u>  JOSHUA TOM  MS BAR. No 105392  McKENNA RANEY  MS BAR No. 106330  AYANNA HILL  MS BAR No. 106590  AMERICAN CIVIL LIBERTIES UNION OF  MISSISSIPPI FOUNDATION, INC.  P.O. Box 2242  JACKSON, MS 39225  PHONE: (601) 354-3408  <a href="mailto:JTOM@ACLU-MS.ORG">JTOM@ACLU-MS.ORG</a>  <a href="mailto:MRANEY@ACLU-MS.ORG">MRANEY@ACLU-MS.ORG</a>  <a href="mailto:AHILL1@ACLU-MS.ORG">AHILL1@ACLU-MS.ORG</a></p> <p>NICOLAS STANOJEVICH*  QUINN, CONNOR, WEAVER, DAVIES &amp; ROUCO  LLP  2 20TH STREET NORTH, SUITE 930  BIRMINGHAM, AL 35203  PHONE: (205) 870-9989  <a href="mailto:NSTANOJEVICH@QCWDR.COM">NSTANOJEVICH@QCWDR.COM</a>  *<i>ADMITTED PRO HAC VICE</i></p> <p><i>COUNSEL FOR PLAINTIFFS</i></p>
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**CERTIFICATE OF SERVICE**

I certify that the foregoing has been filed on the ECF system which served all counsel of record on this 11<sup>th</sup> day of July, 2025.

*s/ Joshua Tom*

Joshua Tom

Co-counsel for Plaintiffs